



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 11, 2021

SARA DIEHR, TREASURER
STAND FOR AMERICA PAC
601 NEW JERSEY AVENUE NW SUITE 620
WASHINGTON, DC 20001

Response Due Date
11/15/2021

IDENTIFICATION NUMBER: C00765982

REFERENCE: MID-YEAR REPORT (01/01/2021 - 06/30/2021)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(f) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must

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be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action promptly by providing the date and method of your remedy (refund, transfer to a non-federal account and/or reattribution) for each contribution. The committee should retain for its records copies of refund checks, transfers to nonfederal account, and/or letters reattributing the contributions in question. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

2. Schedule A (see attached) discloses contributions from individuals who have a mailing address outside of the United States of America. Please be advised that 52 U.S.C. §30121(a) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If your committee follows the safe harbor guidelines outlined under 11 CFR §110.20(a)(7) for all contributions received from a foreign address to ensure that the sources of these contributions are not foreign nationals, please provide a detailed description of your procedures. These procedures must be used in all cases where a contributor or donor uses a foreign passport or passport number for identification purposes, provides a foreign address, makes a contribution or donation by means of a check or other written instrument drawn on a foreign bank or by wire transfer from a foreign bank, or resides abroad. A committee is deemed to have conducted a reasonable inquiry into the contributor or donor's nationality if you seek and obtain copies of current and valid U.S. passport papers

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for U.S. citizens. No person may rely on this safe harbor if he or she has actual knowledge that the source of the funds solicited, accepted, or received is a foreign national.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action promptly by providing the date of the refund. The committee should retain for its records copies of refund check(s). In addition, any refunds should be disclosed on Schedule B supporting Line 28 (a) of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution(s), prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

3. Schedule B supporting Line 21(b) of your report discloses \$35,241.68 in activity identified as MEMO entries that do not appear to correspond with any itemized transaction(s). Please be advised, a memo entry is used to disclose additional information about an itemized transaction and the amount of a memo entry is not included in the total receipts or disbursements for the report. Please amend your report to provide clarifying information regarding this activity. (11 C.F.R. § 104.3(a) and (b))

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RAFI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt

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press 5 to reach the Reports Analysis Division) or my local number(202) 694-1164.

Sincerely,

A handwritten signature in black ink that reads "C. Hinton". The signature is written in a cursive, slightly slanted style.

Clyde Hinton

Senior Campaign Finance Analyst

Apparent Impermissible, Excessive, and Prohibited Contributions
Stand for America PAC (C00765982)

Apparent Excessive Contributions from Individuals

| Contributor Name | Date | Amount | Report |
|-------------------------|-------------|---------------|---------------|
| BRANIGAN, KEVIN P MR | 5/20/21 | \$2,500.00 | 2021 Mid-Year |
| BRANIGAN, KEVIN P MR | 5/31/21 | \$1,000.00 | 2021 Mid-Year |
| BRANIGAN, KEVIN P MR | 6/21/21 | \$2,500.00 | 2021 Mid-Year |
| BRANIGAN, KEVIN P MR | 6/21/21 | \$5.00 | 2021 Mid-Year |
| BRANIGAN, KEVIN P MR | 6/26/21 | \$2,000.00 | 2021 Mid-Year |
| | | | |
| BRUMME, KATHRYN | 4/13/21 | \$5,000.00 | 2021 Mid-Year |
| BRUMME, KATHRYN | 4/13/21 | \$500.00 | 2021 Mid-Year |
| | | | |
| FELMLY, PATRICIA | 6/28/21 | \$10,000.00 | 2021 Mid-Year |
| | | | |
| MARVIN, SUSAN | 1/22/21 | \$1,000.00 | 2021 Mid-Year |
| MARVIN, SUSAN | 6/28/21 | \$5,000.00 | 2021 Mid-Year |
| | | | |
| MEJAN, THEODORE B MR. | 6/24/21 | \$5,035.00 | 2021 Mid-Year |
| | | | |
| MIRSKY, CYNTHIA A MS | 1/26/21 | \$500.00 | 2021 Mid-Year |
| MIRSKY, CYNTHIA A MS | 4/5/21 | \$2,000.00 | 2021 Mid-Year |
| MIRSKY, CYNTHIA A MS | 4/22/21 | \$500.00 | 2021 Mid-Year |
| MIRSKY, CYNTHIA A MS | 5/21/21 | \$1,500.00 | 2021 Mid-Year |
| MIRSKY, CYNTHIA A MS | 6/28/21 | \$500.00 | 2021 Mid-Year |
| MIRSKY, CYNTHIA A MS | 6/28/21 | \$60.00 | 2021 Mid-Year |
| | | | |
| PHILLIPS, JORDAN | 6/30/21 | \$10,000.00 | 2021 Mid-Year |
| | | | |
| SHEEHY, TIMOTHY | 3/14/21 | \$5,000.00 | 2021 Mid-Year |
| SHEEHY, TIMOTHY | 3/14/21 | \$1.00 | 2021 Mid-Year |
| | | | |
| SMEAD, LARRY | 5/10/21 | \$1,000.00 | 2021 Mid-Year |
| SMEAD, LARRY | 5/31/21 | \$1,000.00 | 2021 Mid-Year |
| SMEAD, LARRY | 6/26/21 | \$1,000.00 | 2021 Mid-Year |
| SMEAD, LARRY | 6/26/21 | \$500.00 | 2021 Mid-Year |
| SMEAD, LARRY | 6/26/21 | \$500.00 | 2021 Mid-Year |
| SMEAD, LARRY | 6/26/21 | \$75.00 | 2021 Mid-Year |

Apparent Impermissible, Excessive, and Prohibited Contributions
Stand for America PAC (C00765982)

| | | | |
|--------------|---------|------------|---------------|
| SMEAD, LARRY | 6/26/21 | \$75.00 | 2021 Mid-Year |
| SMEAD, LARRY | 6/26/21 | \$75.00 | 2021 Mid-Year |
| SMEAD, LARRY | 6/26/21 | \$75.00 | 2021 Mid-Year |
| SMEAD, LARRY | 6/26/21 | \$5.00 | 2021 Mid-Year |
| SMEAD, LARRY | 6/30/21 | \$1,000.00 | 2021 Mid-Year |

| | | | |
|--------------|---------|------------|---------------|
| STAHL, LEWIS | 1/22/21 | \$5,000.00 | 2021 Mid-Year |
| STAHL, LEWIS | 6/21/21 | \$500.00 | 2021 Mid-Year |
| STAHL, LEWIS | 6/21/21 | \$500.00 | 2021 Mid-Year |
| STAHL, LEWIS | 6/21/21 | \$75.00 | 2021 Mid-Year |
| STAHL, LEWIS | 6/21/21 | \$75.00 | 2021 Mid-Year |
| STAHL, LEWIS | 6/21/21 | \$75.00 | 2021 Mid-Year |
| STAHL, LEWIS | 6/21/21 | \$75.00 | 2021 Mid-Year |
| STAHL, LEWIS | 6/21/21 | \$75.00 | 2021 Mid-Year |
| STAHL, LEWIS | 6/21/21 | \$7.00 | 2021 Mid-Year |
| STAHL, LEWIS | 6/21/21 | \$5.00 | 2021 Mid-Year |

**Apparent Impermissible, Excessive, and Prohibited Contributions
Stand for America PAC (C00765982)**

Contributions from Possible Foreign Nationals

| Contributor Name | Date | Amount | Report |
|-------------------------|-------------|---------------|---------------|
| MILLS, BONNIE | 4/28/21 | \$250.00 | 2021 Mid-Year |
| COTTON, JOHN C | 5/12/21 | \$1,500.00 | 2021 Mid-Year |